

IN THE UNITED STATES DISTRICT COURT  
FOR THE NORTHERN DISTRICT OF IOWA  
WESTERN DIVISION

UNITED STATES OF AMERICA,	)	
	)	No. 23-CR-4019
Plaintiff,	)	
	)	<b>INDICTMENT</b>
vs.	)	
	)	Count 1
CASSANDRA LYNNE VONNAHME,	)	21 U.S.C. § 843(a)(3):
	)	Acquiring a Controlled
Defendant.	)	Substance by Means of
	)	Misrepresentation, Fraud,
	)	Deception, and Subterfuge
	)	
	)	Count 2
	)	18 U.S.C. § 1035(a):
	)	False Statements Relating to
	)	Health Care Matters

The Grand Jury charges:

**Count 1**  
**Acquiring a Controlled Substance by Misrepresentation,  
Fraud, Deception, and Subterfuge**

Between on or about November 14, 2020, and continuing through on or about December 22, 2020, in the Northern District of Iowa, defendant CASSANDRA LYNNE VONNAHME did knowingly and intentionally acquire and obtain hydrocodone, a Schedule II controlled substance, and tramadol, a Schedule IV controlled substance, by misrepresentation, fraud, deception, and subterfuge.

This was in violation of Title 21, United States Code, Section 843(a)(3).

Count 2  
**False Statements Relating to Health Care Matters**

Between on or about November 14, 2020, and continuing through on or about December 22, 2020, in the Northern District of Iowa, defendant CASSANDRA LYNNE VONNAHME, while involved in health care benefit program matters, did knowingly and willfully: (1) falsify, conceal, and cover up by trick, scheme, and device material facts; and (2) make materially false, fictitious, and fraudulent statements and representations, and make and use materially false writings and documents knowing the same to contain materially false, fictitious, and fraudulent statements and entries. Specifically, defendant would sign out controlled substances for patient use, but use the controlled substances for personal use and fail to complete the rest of the health care paperwork. All of the above was done in connection with the delivery of and payment for health care benefits, items, and services.

This was in violation of Title 18, United States Code, Section 1035(a).

A TRUE BILL

/s/

Grand Jury Foreperson

2/16/2023  
Date

TIMOTHY T. DUAX  
United States Attorney

By:



RON TIMMONS  
Assistant United States Attorney

PRESENTED IN OPEN COURT  
BY THE  
FOREMAN OF THE GRAND JURY

FEB 16 2023

And filed  
PAUL DE YOUNG, CLERK